ON Peter A. Moore, Jr., Clerk
US District Court
Eastern District of NO

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NORTH CAROLINA WESTERN DIVISION

NO. 5:21-CR-417-1D(4)

UNITED STATES OF AMERICA)	
)	
V.)	INDICTMENT
)	
GARBART PIQUANT)	
a/k/a "Gabart Piquant")	

The Grand Jury charges:

COUNT ONE

On or about October 6, 2014, in Eastern District of North Carolina, the defendant, GARBART PIQUANT, also known as "Gabart Piquant," did willfully and knowingly make a false statement in an application for a passport with intent to induce and secure for his own use the issuance of a passport under the authority of the United States, contrary to the laws regulating the issuance of such passports and the rules prescribed pursuant to such laws, in that in such application the defendant stated he was a United States citizen born in Virginia, which statement he knew to be false, in violation of Title 18, United States Code, Section 1542.

COUNT TWO

On or about November 6, 2018, in the Eastern District of North Carolina, the defendant, GARBART PIQUANT, also known as "Gabart Piquant," an alien, knowing he was not a United States citizen, did knowingly vote in an election held in part for the purpose of electing a candidate for the office of President, Vice President, and

Member of the House of Representatives, in violation of Title 18, United States Code, Section 611(a).

COUNT THREE

On or about February 11, 2019, in Eastern District of North Carolina, the defendant, GARBART PIQUANT, also known as "Gabart Piquant," did willfully and knowingly use and attempt to use passport Number XXXXX6878 issued under the authority of the United States, the issuance of which was secured by reason of a false statement made in the application therefor which falsely stated that the defendant was born in Virginia, which said passport the defendant used and attempted to use in order to apply for and obtain a North Carolina Real Identification Driver's License, in violation of Title 18, United States Code, Section 1542.

COUNT FOUR

On or about February 11, 2019, in the Eastern District of North Carolina and elsewhere, the defendant, GARBART PIQUANT, also known as "Gabart Piquant," an alien in the United States, did falsely and willfully represent himself to be a citizen of the United States, in violation of Title 18, United States Code, Section 911.

COUNT FIVE

On or about March 3, 2020, in the Eastern District of North Carolina, the defendant, GARBART PIQUANT, also known as "Gabart Piquant," an alien, did knowingly make a false statement and claim that he was a citizen of the United States in order to register to vote in a Federal, State, and local election, in violation of Title 18, United States Code, Section 1015(f).

COUNT SIX

On or about March 3, 2020, in the Eastern District of North Carolina and elsewhere, the defendant, GARBART PIQUANT, also known as "Gabart Piquant," an alien in the United States, did falsely and willfully represent himself to be a citizen of the United States, in violation of Title 18, United States Code, Section 911.

COUNT SEVEN

On or about March 3, 2020, in the Eastern District of North Carolina, the defendant, GARBART PIQUANT, also known as "Gabart Piquant," an alien, knowing he was not a United States citizen, did knowingly vote in an election held in part for the purpose of electing a candidate for the office of President, Vice President, and Member of the House of Representatives, in violation of Title 18, United States Code, Section 611(a).

COUNT EIGHT

On or about October 27, 2020, in the Eastern District of North Carolina and elsewhere the defendant, GARBART PIQUANT, also known as "Gabart Piquant," an alien, did knowingly make a false statement and claim that he was a citizen of the United States in order to register to vote in a Federal, State, and local election, in violation of Title 18, United States Code, Section 1015(f).

COUNT NINE

On or about October 27, 2020, in the Eastern District of North Carolina and elsewhere, the defendant, GARBART PIQUANT, also known as "Gabart Piquant," an

alien in the United States, did falsely and willfully represent himself to be a citizen of the United States, in violation of Title 18, United States Code, Section 911.

COUNT TEN

On or about November 3, 2020, in the Eastern District of North Carolina, the defendant, GARBART PIQUANT, also known as "Gabart Piquant," an alien, knowing he was not a United States citizen, did knowingly vote in an election held in part for the purpose of electing a candidate for the office of President, Vice President, and Member of the House of Representatives, in violation of Title 18, United States Code, Section 611(a).

A TRUE BILL

REDACTED VERSION

Pursuant to the E-Government Act and the federal rules, the unredacted version of this document has been filed under seal.

FOREPERSON U

DATE MIN

G. NORMAN ACKER, III
Acting United States Attorney

BY: GABRIEL J. DIAZ

Assistant United States Attorney